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Attorneys for Defendant, Ocwen Loan Servicing, LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

IN RE:

ALESSI & KOENIG, LLC,

Debtor.

LINDA FONG,

Plaintiff,

vs.

OCWEN LOAN SERVICING, LLC;
QUALITY LOAN SERVICE
CORPORATION; INDYMAC BANK, F.S.B.;
FIRST AMERICAN TITLE INSURANCE
CO.; RONALD W. WINTER; AND TRACI M.
WINTER; DOES 1 through X, inclusive; ROE
BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No. BK-S-16-16593-ABL
Chapter 7

Adversary Proceeding:

NOTICE OF REMOVAL

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Defendant, Ocwen Loan Servicing, LLC ("Ocwen") hereby removes Case No. A-15-719472-C, pending in the Eighth Judicial District Court, State of Nevada, (the "State Court action") to the United States Bankruptcy Court, District of Nevada,

pursuant to 28 U.S.C. §§ 1334 and 1452, and Local Rule 9027. This removal is authorized by the Court's Order Approving Stipulation Regarding Relief from the Automatic Stay Pursuant to Local Rule 4001(c) With Regard to Removal of Cases to the Bankruptcy Court, filed in *In Re: Alessi & Koenig, LLC*, Case No. BK-S-16-16593-ABL. ECF No. 131.

The State Court action concerns a homeowner's association's non-judicial foreclosure sale, which occurred on June 25, 2014, involving real property situated at 9490 Thunder Sky Street, #102, Las Vegas, Nevada 89178 (the "HOA Sale"). Debtor, Alessi & Koenig, LLC, was the foreclosure trustee and conducted the HOA Sale. The State Court case arises out of and relates to the HOA Sale, and Debtor's conduct in connection therewith, including its subsequent handling of the proceeds of the HOA Sale.

Upon removal, Ocwen consents to entry of final orders and judgments by the Bankruptcy Court.

True and correct copies of all process and pleadings filed in the State Court case are attached hereto as **Exhibits 1-37**.

DATED this 11th day of March, 2017.

WRIGHT, FINLAY & ZAK, LLP

/s/ Regina A. Habermas

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EXHIBIT LIST

Exhibit 1	Complaint
Exhibit 2	Notice of Lis Pendens – Plaintiff
Exhibit 3	First Amended Complaint
Exhibit 4	Affidavit of Service – Ocwen Loan Servicing
Exhibit 5	Affidavit of Service – Quality Loan Service Corporation
Exhibit 6	Initial Appearance Fee Disclosure – Ocwen Loan Servicing
Exhibit 7	Ocwen’s Notice of Appearance
Exhibit 8	Notice of Appearance – First American Title Insurance Co.
Exhibit 9	Initial Appearance Fee Disclosure - First American Title Insurance Co.
Exhibit 10	Affidavit of Service – First American Title Insurance Co.
Exhibit 11	Stipulation and Order to Dismiss with Prejudice First American Title Ins. Co.
Exhibit 12	Summons and Affidavit of Service – First American Title Ins. Co.
Exhibit 13	Notice of Entry of Stipulation and Order to Dismiss with Prejudice First American Title Ins. Co.
Exhibit 14	Summons and Affidavit of Service – Traci Winter
Exhibit 15	Summons and Affidavit of Service – Traci Winter
Exhibit 16	Three Day Notice of Intent to Default – Ronald Winter
Exhibit 17	Three Day Notice of Intent to Take Default – Traci Winter
Exhibit 18	Ex Parte Motion to Extend Time for Service and for Service by Publication of Summons and Complaint to Defendant Indymac Bank
Exhibit 19	Affidavit of Robert B. Noggle in Support of Ex Parte Motion to Extend Time for Service and for Service by Publication of Defendant Indymac Bank
Exhibit 20	Ex Parte Motion to Extend Time for Service of Summons and Complaint to Defendant Indymac Bank

1	Exhibit 21	Affidavit of Brad D. Bace in Support of Ex Parte Motion to Extend Time
2		for Service of Summons and Complaint to Defendant Indymac Bank
3	Exhibit 22	Stipulation for Non-Monetary Relief – Quality Loan Service Corp.
4	Exhibit 23	Ex Parte Motion to Extend Time for Service of Summons and Complaint
5		to Defendant Indymac Bank
6	Exhibit 24	Default – Ronald Winter
7	Exhibit 25	Amended Affidavit of Service – Traci Winter
8	Exhibit 26	Ex Parte Order to Extend Time for Service of Summons and Complaint to
9		Defendant Indymac Bank
10	Exhibit 27	Affidavit of Service – Traci Winter
11	Exhibit 28	Default – Traci Winter
12	Exhibit 29	Notice of Entry of Order on Stipulation for Non-Monetary Relief – Quality
13		Loan Service Corp.
14	Exhibit 30	Affidavit of Service – Indymac Bank c/o Nevada Secretary of State
15	Exhibit 31	Three Day Notice of Intent to Default – Indymac Bank
16	Exhibit 32	Default – Indymac Bank
17	Exhibit 33	Stipulation and Order to Extend Time for Filing of a Responsive Pleading
18		by Defendant Ocwen Loan Servicing or its Successor in Interest
19	Exhibit 34	Notice of Entry of Stipulation and Order to Extend Time for Filing of a
20		Responsive Pleading by Defendant Ocwen Loan Servicing or its Successor
21		in Interest
22	Exhibit 35	Ocwen’s Answer to First Amended Complaint
23	Exhibit 36	Notice of Lis Pendens – Ocwen Loan Servicing
24	Exhibit 37	Amended Notice of N.R.C.P. 16.1 Early Case Conference